

PACIFIC HILLS DENTAL, P.C.

January 16, 2015

Wayne Stuberg, PT (Chair)
Members, 407 Technical Review Committee
c/o Ronald Briel
Program Manager, Credentialing Review Program
Department of Health and Human Services
Licensure Unit, RPQI
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Dear Dr. Stuberg and Members of the Committee:

I am a practicing dentist in Omaha. I have been fortunate to have practiced dentistry for the last 5 years in Nebraska after graduating from UNMC College of Dentistry. Also in that time I have been active in the Nebraska Dental Association, Nebraska Academy of General Dentistry (currently serving as President-Elect), the Nebraska Mission of Mercy, and the Special Olympics Special Smiles Clinic.

I am writing in support of the NDA/NDAA's 407 because the role of non-dentists in the dental clinic should be expanded to include certain tasks that they can reliably perform with adequate training. These tasks as outlined by the application are such that when performed by someone who is not a dentist, have absolutely minimal risk to the patient. I believe that the application as prepared by the Nebraska Dental Association adheres to the medical/dental principle of "Do No Harm." This principle is critical to any expansion of duties in my mind. With the principle of "Do No Harm" satisfied, the benefits of expanded duties by non-dentists in an environment properly supervised by a dentist can provide benefits to patients including increased access to care, shorter visits (decreasing stress and burden on the patient), while maintaining quality. There are many more benefits to implementing this role in Nebraska dental clinics that the committee has heard testimony on. Aside from the benefits, I also believe that the Board of Dentistry should have the ability to approve educational standards for dental assistants.

In addition, it is my opinion that dental assistants who are trained "on the job" still have a valuable place in the dental office. In many communities across Nebraska, (I worked in Sidney and Chadron dental clinics during my senior year in dental school) the only training available to prospective dental assistants may be "on the job." Hence, the requirement for all dental assistants to be licensed would be an unwarranted burden on the dental offices in such communities. These dental assistants obviously would not be allowed to perform expanded tasks without the additional training.

Sincerely,

Thomas St. Germain, DDS

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